

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

IN RE:)
)
OPTIMA UNIVERSITY, LLC) Case No. 09-11212
) Chapter 11
) Judge: Boswell
Debtor.)
)

RESPONSE OF DEBTOR OPTIMA UNIVERSITY, LLC TO THE MOTION
OF THE NATIONAL BOARD OF MEDICAL EXAMINERS FOR RELIEF
FROM STAY AND REQUEST A HEARING THEREON

Comes the Debtor, through counsel, and for response to the motion of the National Board of Medical Examiners ("NBME") for relief from stay would object to said motion and request a hearing thereon. In support thereof, the following would be shown unto the Court:

1. The Debtor, OPTIMA UNIVERSITY, LLC, admits the allegations as contained in paragraph 1 of the motion filed herein.
2. The Debtor, OPTIMA UNIVERSITY, LLC, admits the allegations as contained in paragraph 2 of the motion filed herein.
3. The Debtor, OPTIMA UNIVERSITY, LLC, admits the allegations as contained in paragraph 3 of the motion filed herein.
4. The Debtor, OPTIMA UNIVERSITY, LLC, admits the allegations as contained in paragraph 4 of the motion filed herein.
5. The Debtor, OPTIMA UNIVERSITY, LLC, admits the allegations as contained in paragraph 5 of the motion filed herein.
6. The Debtor, OPTIMA UNIVERSITY, LLC, admits the allegations as contained in paragraph 6 of the motion filed herein.
7. The Debtor, OPTIMA UNIVERSITY, LLC, denies the allegations as contained in paragraph 7 of the motion filed herein.
8. The Debtor, OPTIMA UNIVERSITY, LLC, admits the allegations as contained in paragraph 8 of the motion filed herein.

9. The Debtor, OPTIMA UNIVERSITY, LLC, denies the allegations as contained in paragraph 9 of the motion filed herein.
10. The Debtor, OPTIMA UNIVERSITY, LLC, denies the allegations as contained in paragraph 10 of the motion filed herein.
11. Any allegation not specifically admitted or denied is denied as fully as if set out specifically.

WHEREFORE, the Debtor, OPTIMA UNIVERSITY, LLC, prays that the motion filed herein be dismissed with costs, if any, taxed to the Movant.

Respectfully submitted,

/s/ Steven L. Lefkovitz, No. 5953
Steven L. Lefkovitz, No. 5953
Christopher M. Kerney, No. 20819
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CERTIFICATE OF SERVICE

I hereby certify that I have sent a true and exact copy of the foregoing to the U.S. Trustee, 200 Jefferson Avenue, Suite 400, Memphis, Tennessee 38157; to the Debtor and to all other Creditors and Parties of Interest; by CM/ECF, on this the 4th day of May, 2009.

/s/ Steven L. Lefkovitz, No. 5953
Steven L. Lefkovitz/Christopher M. Kerney